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**From:** Cathy Laughner [cathyl@bkbh.com]  
**Sent:** 9/15/2021 3:45:39 AM  
**To:** Livingston, Peggy [Livingston.Peggy@epa.gov]  
**CC:** Thomas Jodoin [TJODOIN@helenamt.gov]  
**Subject:** City of Helena Unilateral Admin Order (UAO)  
**Attachments:** RE: City of Helena - Sampling and Analysis Plan

Peggy,

Paragraph 91 of the UAO requires the City to update its sampling plan. You may not be aware of my April 9, 2021 communication to Robyn explaining to her that the City sent the Sampling Plan on August 31, 2020 and never heard anything back from EPA. Robyn wrote me an email on 4/12/2021 that she will review my statement with Emilio L. and Al Garcia, but we heard nothing more from EPA. See attached. The City's August 31, 2020 SAP addresses records on page 1 with a summary of requirements and reference to the Industrial User permit's, Monitoring and Records Section. The IU Permit Monitoring and Records Section is comprehensive and includes all of the CFR 403.12 (o) requirements.

Now that you have this information, would you please clarify what EPA requires in Paragraph 91.

Thanks.

Catherine Laughner